

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

KATHLEEN GREEN-JOHNSON, §
Individually and On Behalf of §
All Others Similarly Situated, §
Plaintiff §

VS. §

CIVIL ACTION NO. 4:12-CV-01307

BP EXPLORATION OPERATING §
COMPANY, LTD., BP CORPORATION §
NORTH AMERICA, INC., OM §
OM CONSULTING, INC. §
D/B/A WISE MEN CONSULTANTS §
and FIRCROFT, INC., §
Defendants §

**DEFENDANT OM CONSULTING, INC.
D/B/A WISE MEN CONSULTANTS'
INITIAL DISCLOSURES**

Defendant, OM CONSULTING, INC. D/B/A WISE MEN CONSULTANTS, files this, its
initial disclosures pursuant to Fed. R. Civ. P. 26 as follows:

1. The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.

Kathleen Green-Johnson (Plaintiff)
c/o Galvin B. Kennedy
Kennedy Hodges, L.L.P.
711 W. Alabama Street
Houston, Texas 77006
(713) 523-0001
Plaintiff may testify concerning matters alleged in their Complaint.

Fircroft, Inc. (Defendant)
Sidney C. Watts
Hoover Slovacek, L.L.P.
5847 San Felipe, Suite 2200
Houston, Texas 77057

(713) 977-8686

Defendant and its corporate representatives may testify concerning matters alleged in their Answer.

OM Consulting, Inc. d/b/a Wise Men Consultants (Defendant) ("OM Consulting")

c/o Ted A. Cox

Ted A. Cox, P.C.

1225 W. 34th Street

Houston, Texas 77018

(713) 956-9400

Defendant and its corporate representatives may testify concerning matters alleged in their Answer.

BP Exploration Operating Company, Ltd. (Defendant) ("BP")

BP Corporation North America, Inc. (Defendant) ("BP")

David M. Minces

Mize, Minces & Clark, PC

800 Travis, Suite 453

Houston, Texas 77002

(713) 595-9675

Defendants and their corporate representatives may testify concerning matters alleged in their Answer.

2. A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

The following documents are in the possession of Defendant OM Consulting, Inc. d/b/a Wise Men Consultants:

- Agreements between OM Consulting and the Plaintiff
- Agreements between OM Consulting and BP
- Time and payroll records of OM Consulting for Plaintiff

3. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

None

4. For inspection and copying as under Rule 34, any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

None

Respectfully submitted,

~~TED A. COX, P.C.~~

A handwritten signature in dark ink, appearing to read 'Ted A. Cox', is written over a horizontal line.

Ted A. Cox

State Bar No. 04956480

1225 W. 34th Street

Houston, Texas 77018

(713) 956-9400

(713) 956-8485 fax

ATTORNEY FOR DEFENDANT,
OM CONSULTING, INC.
D/B/A WISE MEN CONSULTANTS

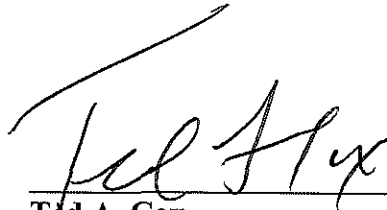
CERTIFICATE OF SERVICE

On this 1st day of October, 2012, a true and correct copy of the foregoing document was forwarded in accordance with the Federal Rules of Civil Procedure to the following parties:

Galvin B. Kennedy
Kennedy Hodges, L.L.P.
711 W. Alabama Street
Houston, Texas 77006
Facsimile: 713-523-1116

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Ted A. Cox